## LISTING OF THE CLAIMS

Claims 1-8 (Cancelled).

9. (Previously Presented) The device of claim 16 wherein the first trigger region adjoins the semiconductor material; and the second trigger region adjoins the semiconductor material.

Claims 10-12 (Cancelled).

- 13. (Previously Presented) The device of claim 16 wherein during a first ESD event, a first potential on the first and second contact regions is greater than a second potential on the third and fourth contact regions.
- 14. (Previously Presented) The device of claim 13 wherein during a second ESD event, a third potential on the third and fourth contact regions is greater than a fourth potential on the first and second contact structures.
  - 15. (Previously Presented) The device of claim 16 wherein the semiconductor material has a top surface;

the first well has a side surface that contacts the top surface, and a bottom surface that contacts the side surface; and

the first trigger region is spaced apart from the bottom surface.

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16. (Previously Presented) A device formed in a semiconductor material of a first conductivity type, the semiconductor material having a surface, the device comprising:

a first well of a second conductivity type formed in the semiconductor material, the first well having a dopant concentration;

a second well of the second conductivity type formed in the semiconductor material, the second well having a dopant concentration and being spaced apart from the first well;

a first contact region of the first conductivity type formed in the first well;

a second contact region of the second conductivity type formed in the first well, the second contact region being electrically connected to the first contact region to have a same potential;

a first trigger region of the second conductivity type formed in the first well, the first trigger region being spaced apart from the first and second contact regions;

a third contact region of the first conductivity type formed in the second well;

a fourth contact region of the second conductivity type formed in the second well, the fourth contact region being electrically connected to the third contact region to have a same potential;

a second trigger region of the second conductivity type formed in the second well, the second trigger region being spaced apart from the third and fourth contact regions;

a separation region of the semiconductor material located only between the first and second trigger regions, the separation region contacting the surface, the first trigger region, and the second trigger region; and

a device region that overlies and contacts the surface at a location where the separation region contacts the surface between the first and second trigger regions, the device region at the location being free of a gate, and not lying below a gate. 17. (Previously Presented) The device of claim 16 wherein the first and second trigger regions are formed on opposite sides of the separation region.

18. (Previously Presented) The device of claim 16 wherein the first trigger region has a dopant concentration greater than the dopant concentration of the first well; and

the second trigger region has a dopant concentration greater than the dopant concentration of the second well.

- 19. (Previously Presented) The device of claim 16 wherein no other region having the second conductivity type and a dopant concentration greater than the first well lies between the first trigger region and the second trigger region.
- 20. (Previously Presented) The device of claim 16 wherein the first trigger region is not directly electrically connected to the third contact region, and the second trigger region is not directly electrically connected to the first contact region.
  - 21. (Cancelled)

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